

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**UNITED STATES OF AMERICA ex rel.
CAMERON JEHL,**

Plaintiffs,

v.

**GGNSC SOUTHAVEN LLC D/B/A
GOLDEN LIVING CENTER-
SOUTHAVEN et al.**

Defendants.

Case No. 3:19cv091-NBB-JMV

**DEFENDANTS' REPLY TO RELATOR'S OPPOSITION TO DEFENDANTS' MOTION
FOR AWARD OF ATTORNEYS' FEES AND OTHER EXPENSES**

Defendants GGNSC Southaven LLC, GGNSC Administrative Services LLC, and GGNSC Clinical Services LLC (“Defendants”) hereby respectfully submit their Joint Reply Memorandum in Support of Their Reply to Relator’s Opposition to Defendants’ Motion for Award of Attorneys’ Fees and Other Expenses.

The Reply is supported by the following exhibits and the supporting Memorandum of Law filed herewith:

Exhibit 1 – Summary of Attorneys’ Fees and Expenses Incurred as of May 1, 2023.

Exhibit 2 – Declaration of Robert Salcido in Support of Defendants’ Joint Reply in Support of Motion for Award of Attorneys’ Fees and Other Expenses.

Exhibit A to Exhibit 2 – June 15, 2020 E-mail from Robert Salcido to Relator Counsel Nathan Sanders.

Exhibit B to Exhibit 2 – Litigation Analytics Docket Report for Robert Salcido (Filtered for “False Claims Act”).

Exhibit C to Exhibit 2 – Litigation Analytics Docket Reports for Six Relator-Identified Southern District of Mississippi Attorneys (Filtered for “False Claims Act”).

Exhibit D to Exhibit 2 – Redacted April 2023 invoice of Akin Gump Strauss Hauer & Feld.

Exhibit 3 – Declaration of Margaret Sams Gratz in Support of Defendants’ Submissions and Briefings in Support of an Award of Attorneys’ Fees.

Exhibit A to Exhibit 3 – Litigation Analytics Report Docket Analysis for Margaret Sams Gratz (January 2005-May 2023)

Exhibit B to Exhibit 3 – Litigation Analytics Report Docket Analysis for M. Margaret Sams (January 1999-December 2003)

May 26, 2023

Respectfully submitted,

/s/ Margaret Sams Gratz
Margaret Sams Gratz, Esq. (MSB # 99231)
William Grant Armistead (MSB # 9786)
Mitchell, McNutt & Sams, P.A.
P. O. Box 7120
Tupelo, MS 38802-7120
Telephone: (662) 842-3871
Facsimile: (662) 842-8450
mgratz@mitchellmcnutt.com

Robert Salcido (*pro hac vice*)
D.C. Bar No. 447951
Akin Gump Strauss Hauer & Feld LLP
2001 K. Street, N.W.
Washington, D.C. 20006
Telephone: 202-887-4000
Facsimile: 202-887-4288
rsalcido@akingump.com

Attorneys for Defendants

**GGNSC Southaven LLC; GGNSC
Administrative Services LLC; GGNSC
Clinical Services**

CERTIFICATE OF SERVICE

This is to certify that I, Robert Salcido, one of the attorneys for GGNSC Southaven, LLC individually and on behalf of all Defendants have this day furnished a true and correct copy of the above and foregoing **DEFENDANTS' REPLY TO RELATOR'S OPPOSITION TO DEFENDANTS' MOTION FOR AWARD OF ATTORNEYS' FEES AND OTHER EXPENSES** to the following via ECF filing:

Robert B. McDuff (MSB # 2532)
Law Office of Robert B. McDuff
767 North Congress Street
Jackson, MS 39202
Telephone: 601.259.8484
rbm@mcdufflaw.com

Richard R. Barrett (MSB #99108)
Law Office of Richard R. Barrett, PLLC
2086 Old Taylor Road
Suite 1011
Oxford, MS 38655
Telephone 662.380.5018
rrb@rrblawfirm.net

Philip N. Elbert, Esq.
Lisa P. Binder, Esq.
Nathan C. Sanders, Esq.
Neal & Harwell, PLC
1201 Demonbreun St., Suite 1000
Nashville, TN 37203
pelbert@nealharwell.com
lbinder@nealharwell.com
nsanders@nealharwell.com

This the 26th day of May, 2023.

/s/ Robert Salcido

Robert Salcido